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**Jeanne W. Stockman**  
Senior Counsel

November 7, 2018

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Notice of Ex Parte Meeting  
*In the Matter of New Part 4 of the Commission's Rules Concerning  
Disruptions to Communications*, ET Docket No. 04-35; *In the Matter of  
Amendments to Part 4 of the Commission's Rules Concerning Disruptions  
to Communications*, PS Docket No. 15-80

Dear Ms. Dortch:

On November 6, 2018, Jeanne Stockman, Stacy Hartman, and Nick Alexander of CenturyLink participated in a conference call with James Wiley, Brenda Villanueva, and Tiffany Wong of the Public Safety and Homeland Security Bureau to discuss allowing state public utility commissions and other governmental stakeholders direct access to the FCC's Network Outage Reporting System ("NORS").

During the call, CenturyLink reiterated the positions expressed in its comments filed in this proceeding on August 26, 2016. CenturyLink generally supports allowing states access to NORS so long as (1) confidentiality protection equivalent to FOIA can be maintained; (2) access is limited to governmental officials in the context of their role of protecting public health and safety; and (3) state access to NORS data would replace any overlapping or conflicting state outage reporting requirements. CenturyLink stressed that outage data is sensitive and contains information that could harm carriers either competitively or from a network security perspective if disclosed to the public. As such, if states were allowed access to NORS, CenturyLink recommends that it be made aware of what state officials would have access to the company's NORS data, that those officials be trained on maintaining the data's confidentiality, and that they be required to report any confidentiality breaches to the company and to the FCC. CenturyLink also described some of the work that is required for it to comply with state outage reporting requirements, noting that approximately 34 states have outage reporting requirements that, in most cases, do not align with the FCC's reporting criteria. CenturyLink explained that complying with these various state rules poses both a resource burden and a systems burden to

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the company that would be reduced under CenturyLink's proposal if states were to be afforded access to NORS.

CenturyLink also discussed some limitations to state access that would be appropriate from a jurisdictional perspective. For example, states should only be able to access data applicable to their state and for services over which states have jurisdiction. However, NORS contains aggregated information for multistate events and it could place a significant burden on the company to provide information on a state-specific basis. In light of this challenge, CenturyLink acknowledged that the most reasonable course of action may be to allow states to access multistate data for multistate events that affect their particular state.

Finally, Commission staff questioned whether states should be allowed access to data from the FCC's Disaster Information Reporting System ("DIRS"). CenturyLink supports allowing access to DIRS data so long as the same confidentiality protections applicable to NORS data would also apply to DIRS data.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, an electronic copy of this letter is being filed in the above-referenced dockets. If you have any questions, please contact the undersigned.

Respectfully submitted,

/s/ Jeanne W. Stockman

cc (via e-mail):

James Wiley

Brenda Villanueva

Tiffany Wong